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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

CLERK US DISTRICT COURT NORTHERN DIST. OF TX

2010 MAR 24 PM 2: 48

UNITED STATES OF AMERICA v.

JESSE WILLIAM MCGRAW

NO. 3:09-CR-210-B

MOTION FOR DISCLOSURE OF CRIMINAL RECORDS OF

WITNESSES - I LI ENL

Jesse William McGraw, the Defendant in the above-numbered and styled cause, respectfully moves the Court to direct the attorneys for the Government to produce, in advance of trial, all evidence in their possession or available to them, including through the facilities of the National Crime Information Center, any prior arrests or convictions of all persons the Government intends to call as witnesses.

In support thereof, the Defendant states as follows:

- 1. Such information is needed in advance of trial so that the Defendant can cause an investigation to be made as to the disposition of any such charges and the circumstances under which such charges arose, in order to prepare for effective cross-examination of such parties should they appear as witnesses.
- 2. Such information, including not only federal, but also state arrests or convictions, is conveniently available only to representatives of the United States through the facilities available only to them.
- 3. For the purposes of this motion, this Defendant is specifically seeking evidence of arrests for which no final disposition is shown, as well as records of convictions, since the circumstances of the disposition of charges which may have been made against any person who appears as a witness may, and probably will, have a bearing on the credibility of such witness or witnesses.

The Defendant prays to be afforded the latitude applied as pursuant to Estelle v. Gamble as well as any other legal latitude that could be applied Jto Defendant appearing Pro Se, in custody.

Respectfully submitted,

ésse William McGraw

Reg# 38690-177, Seagoville FDC P.O. Box 9000, Seagoville, TX 75159

VERIFICATION

I, Jesse William McGraw, pursuant to 28 U.S. C. \$ 1746 here by declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct, to the best of my knowledge and behalf.

Jesse William McGraw
38690-177